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EVERY MOVE

SINGAPORE LOGISTICS ASSOCIATION



WHISTLEBLOWING POLICY

Version 2023



SINGAPORE LOGISTICS ASSOCIATION WHISTLEBLOWING POLICY

1. OBJECTIVES AND SCOPE

- 1.1. This policy aims to provide a formal, secure and confidential procedure for any person (including without limitation council members, employees, member companies, vendors and other stakeholders of the Singapore Logistics Association ("SLA")) to disclose or raise concerns on any suspected or actual mismanagement, corruption, illegality, impropriety or other wrongdoing in SLA. It will ensure that such concerns are treated seriously and appropriately by SLA, and that any person(s) raising such concerns in good faith will be protected from reprisals or retaliation.
- 1.2. The nature of the concerns covered by this policy include any of the following non-exhaustive list of acts:
 - a. abuse of power or authority;
 - b. fraud e.g. misappropriation of assets, embezzlement of funds, accounting manipulation;
 - c. making fraudulent statements to stakeholders and regulatory authorities:
 - d. non-compliance of internal controls procedure;
 - e. preferential treatment to external parties;
 - f. disclosure of confidential information to external parties:
 - g. conflict of interest without disclosure;
 - h. bribery and corruption e.g. inappropriate personal gain, gift, or facilitation payments;
 - i. serious endangerment to environment, health, and safety of individuals:
 - j. breach of law, rules, regulations and justice;
 - k. improper conduct; and
 - concealment, or deliberate failure to report, a known control breach or weakness.
- 1.3. This policy does not cover grievances. Grievances deal with individual or personal matters and are not a whistle-blowing concern. Grievances will be handled by the Chairman and members of the Corporate Affairs Committee as may be appropriate.

2. REPORTING PROCEDURE

- 2.1. All reports must be made formally in writing with full details for SLA to efficiently evaluate and investigate a complaint.
- 2.2. The report, which should be sealed and marked 'Private & Confidential', is to include, where possible:

- a. name of the person(s) / company(ies) involved in the event(s);
- b. background and history to the concern;
- c. nature of the concern (including methods and action/behaviour involved);
- d. dates or period of time and location the concern had been perpetuated;
- e. evidence substantiating the concern (e.g. documents, e-mails, voice logs, or witness statements); and
- f. whistle-blower's name and contact details.
- 2.3. SLA encourages whistle-blowers to put their names to their report. Concerns expressed anonymously are more difficult to act upon effectively, but they will be considered, taking into account the seriousness and credibility of the issue raised and the likelihood of confirming the allegation from attributable sources and information provided.
- 2.4. The whistle blower may choose to raise their concern and submit the report via the following channels:

By email to slamail@sla.org.sg

By **mail** to Chairman, Singapore Logistics Association

9 Jurong Town Hall Road #03-35 Trade Association Hub

Singapore 609431

- 2.5. Where the report concerns the Chairman, the report shall be submitted to the Deputy Chairpersons instead of the Chairman and the Chairman shall be recused from investigating the report.
- 2.6. The whistle-blower who reports a concern must meet any reasonable request to clarify any facts and/or circumstances, provide information, and cooperate with an investigation. A lack of information can be a reason for SLA to decide not to investigate and/or to conclude that the concern has no factual basis.

3. CONFIDENTIALITY AND PROTECTION FOR WHISTLE-BLOWER

- 3.1. The whistle-blower is required to keep all information confidential.
- 3.2. All reports are handled confidentially, except as necessary or appropriate to conduct investigations and to take remedial action. In this regard, as far as possible, the identity of the whistle-blower making the report will be kept confidential and confined to the persons conducting the investigations and the SLA EXCO.
- 3.3. Allegations made in bad faith may result in disciplinary or other appropriate action against the whistle-blower.

- 3.4. SLA will ensure that no disciplinary measures or other steps will be taken against the whistle-blower if such concern made in good faith later turns out to be mistaken, misguided, or inconclusive.
- 3.5. SLA will not tolerate any threat or retaliation against whistle-blowers in any way. Any person involved in such conduct may be subject to disciplinary or other appropriate action.
- 3.6. The Chairman, Deputy Chairpersons, Honorary Secretary, Deputy Honorary Secretary, Honorary Treasurer and Deputy Honorary Treasurer will be kept informed of all whistle-blowing cases including such details as may be appropriate. If the report concerns any member of these members, the said member shall not be kept informed in his or her capacity as an SLA Council Member.
